

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MATTHEW HARTZ, individually and on behalf of all others similarly situated, )  
Plaintiff, ) Case No: 1:23-cv-04591  
v. ) Hon. Mary M. Rowland  
TAXACT, INC., )  
Defendant. )

## **STIPULATION**

Plaintiff Mathew Hartz (“Plaintiff”) and Defendant TaxAct, Inc. (“TaxAct”), hereby stipulate as follows:

1. On July 15, 2023, Plaintiff filed his complaint against TaxAct. Dkt. No. 1.
2. On September 22, 2023, TaxAct filed its Motion to Compel Arbitration and Stay Proceedings. Dkt. No. 10.
3. On October 17, 2023, Plaintiff filed his Opposition to the Motion to Compel Arbitration and Stay Proceedings. Dkt. No. 16.
4. TaxAct's reply brief in support of the Motion to Compel Arbitration and Stay Proceedings is due October 31, 2023. Dkt. No. 13.
5. The parties have agreed to pursue mediation. The anticipated mediation is scheduled for November 20, 2023.
6. Upon meeting and conferring, the parties have agreed to extend the deadline for TaxAct to file its reply brief in support of the Motion to Compel Arbitration and Stay Proceedings until after an anticipated mediation conference.

7. The parties have further agreed to file a joint status report with this Court by November 30, 2023 that will include an update on mediation, and if necessary, the agreed and proposed deadline for TaxAct to file its reply in support of its Motion to Compel Arbitration and Stay Proceedings.

WHEREFORE, the parties respectfully request that the Court grant this Stipulation and continue the deadline for TaxAct to file its reply in support its Motion to Compel Arbitration and Stay Proceedings.

Dated: October 24, 2023

*/s/ Spencer Sheehan*  
\_\_\_\_\_  
Spencer Sheehan  
Sheehan & Associates, P.C.  
60 Cuttermill Road, Suite 412  
Great Neck, NY 11021  
Tel: (516) 268-7080  
spencer@spencersheehan.com  
  
*Attorneys for Plaintiff*

Respectfully submitted,

*/s/ Ankur Shingal*  
\_\_\_\_\_  
James W. Ducayet  
Ankur Shingal  
Sidley Austin LLP  
One South Dearborn Street  
Chicago, Illinois 60603  
Tel: (312) 853-7000  
jducayet@sidley.com  
ashingal@sidley.com  
  
*Attorneys for Defendant*